

FOLEY & FOLEY
535 High Mountain Road
Suite 210
North Haledon, New Jersey 07508
Phone (973) 304-6003
Counsel for Plaintiff

AMERICAN ASSET FINANCE, LLC,

Plaintiff,

v.

The Corea Firm, PLLC and Thomas M.
Corea, Esq.,

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: PASSAIC COUNTY

DOCKET NO. PAS-L-1307-11

CIVIL ACTION

AFFIDAVIT

Paul Iacovacci, being duly sworn and of full age, deposes and says as follows:

1. I am an officer of Park Funding Company, LLC, a company that purchases interests in settlements of claims and civil actions.
2. On January 19, 2011, our office spoke via telephone with Tom Corea about our interest in purchasing some or all of his interest in the matter entitled Howard Wright v. HealthSouth Corporation, et al. Mr. Corea represented that he was entitled to \$90,000 from the total settlement proceeds of \$225,000.
3. Based on Mr. Corea's inquiry, our office requested a search for open UCC filings on The Corea Firm, PLLC and Mr. Corea. The search identified an UCC-1 filed on January 7, 2011, by American Asset Finance, LLC, against The Corea Firm, PLLC and Mr. Corea relating specifically to their interest in the Wright case. The search also identified a UCC-3 filed by the Corea Firm, PLLC on January 12, 2011, terminating that filing.

RECEIVED and FILED
SUPERIOR COURT OF NEW JERSEY

MAR 15 2011

PASSAIC COUNTY

4. On January 21, 2011, I called American Asset Finance, LLC. I spoke with Tim Foley, a representative of American Asset Finance, LLC (American Asset). I told Mr. Foley that Mr. Corea personally had approached our firm trying to use his interest in the Wright case to obtain funds. Mr. Foley informed me that Mr. Corea and the Corea Firm, PLLC had assigned most of his interest in the Wright case to American Asset on January 7, 2011. Mr. Foley informed me that the UCC-1 had been filed by American Asset pursuant to its agreement with The Corea Firm, PLLC and Mr. Corea, had been terminated fraudulently, and on discovery had been refiled and remained in effect.

FURTHER AFFIANT SAYETH NOT.

Dated: 2/10/11



Name: PAUL IACONELLI

STATE OF NEW YORK }

COUNTY OF NEW YORK }

On February 10th, 2011, before me, personally appeared the above signed known to me (or proved to me on the basis of satisfactory evidence) to be the person whose name is subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity, and that by his/her/their signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.


Notary

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DOUGLAS COON
NOTARY PUBLIC-STATE OF NEW YORK
No. 02CO6175083
Qualified in New York County
My Commission Expires October 01, 2011